

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

EMERSON CREEK POTTERY INC.)

Plaintiff,)

v.)

COUNTRYVIEW POTTERY CO.,)
EMERSON CREEK EVENTS, INC.,)
CHRISTINA DEMIDUK, and)
DAVID DEMIDUK)

Defendants.)

Case No.: 6:20-CV-0054-NKM

DEFENDANTS' PROPOSED JURY INSTRUCTIONS

Pursuant to Federal Rule of Civil Procedure 51, Local Civil Rule 51, and the Order entered January 4, 2021, Defendants hereby submit their proposed Jury Instructions as Exhibit A. Defendants also submit herewith proposed interrogatories. Defendants respectfully request that the Court instruct the jury on Plaintiffs' claims and Defendants' defenses using the instructions submitted herewith. Defendants believe that their equitable defenses of acquiescence and naked licensing are proper for determination by the Court. However, if the Court believes that these should be decided by the jury, Defendants have included proposed Jury Instruction Nos. 19 and 20 and proposed interrogatories related to acquiescence and naked licensing. Defendants reserve the right to propose additional Jury Instructions if the need arises during trial.

Respectfully submitted,

LAUBSCHER & LAUBSCHER, PC

/leljr/

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 15, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/lejlr/

Lawrence E. Laubscher, Jr.
Attorney for Defendants